

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

WSOU INVESTMENTS, LLC D/B/A  
BRAZOS LICENSING AND  
DEVELOPMENT,

Plaintiff,

v.

MICROSOFT CORPORATION

Defendant.

CASE NO. 6:20-CV-00454-ADA  
CASE NO. 6:20-CV-00457-ADA  
CASE NO. 6:20-CV-00460-ADA  
CASE NO. 6:20-CV-00461-ADA  
CASE NO. 6:20-CV-00463-ADA  
CASE NO. 6:20-CV-00464-ADA  
CASE NO. 6:20-CV-00465-ADA

JURY TRIAL DEMANDED

**JOINT MOTION TO STAY**

Plaintiff WSOU Investments, LLC d/b/a Brazos Licensing and Development (“Brazos”) and Defendant Microsoft Corporation (“Microsoft”) (collectively, the “parties”) jointly move to stay the above-captioned cases for forty-five (45) days.

WHEREAS, the parties have executed a binding term sheet resolving the above-captioned cases;

WHEREAS, the parties are in the process of finalizing a settlement to resolve all claims currently pending; and

WHEREAS the proposed stay would vacate all deadlines as to this action.

IT IS HEREBY AGREED AND STIPULATED by and between the parties, subject to the approval of the Court, that this case is stayed for forty-five (45) days. The parties further agree that, at the end of the forty-five day stay, they shall file a joint notice advising the Court of any appropriate relief required, including whether the stay should or should not be continued.

Dated: June 15, 2022

Respectfully Submitted,

By: /s/ Mark D. Siegmund

J. Hoke Peacock III  
Texas Bar No. 15673980  
Max L. Tribble, Jr.  
Texas Bar No. 2021395  
Shawn Blackburn (pro hac vice)  
Texas Bar No. 24089989  
**SUSMAN GODFREY LLP**  
1000 Louisiana Street, Suite 5100  
Houston, TX 77002-5096  
Tel.: (713) 651-9366  
Fax: (713) 654-6666  
tpeacock@susmangodfrey.com  
mtribble@susmangodfrey.com  
sblackburn@susmangodfrey.com

Kalpana Srinivasan  
California Bar No. 237460  
Anna Catherine Coll (pro hac vice)  
California Bar No. 337548  
**SUSMAN GODFREY LLP**  
1900 Avenue of the Stars, 14th Floor  
Los Angeles, CA 90067-6029  
Tel.: (310) 789-3100  
Fax: (310) 789-3150  
ksrinivasan@susmangodfrey.com  
acoll@susmangodfrey.com

Elizabeth Aronson (pro hac vice)  
State Bar No. 5704432  
**SUSMAN GODFREY LLP**  
1301 Avenue of the Americas, 32nd Floor  
New York, NY 10019  
(212) 336-8330  
(212) 336-8340  
baronson@susmangodfrey.com

Mark D. Siegmund  
State Bar No. 24117055  
**STECKLER WAYNE CHERRY & LOVE PLLC**  
8416 Old McGregor Road

/s/ Melissa R. Smith (with permission)

Michael J. Bettinger  
Bar No. 122196  
mbettinger@sidley.com  
Brooke S. Boll  
Bar No. 318372  
brooke.boll@sidley.com  
Irene Yang  
Bar No. 245464  
irene.yang@sidley.com  
**SIDLEY AUSTIN LLP**  
555 California Street, Suite 2000  
San Francisco, CA 94104  
Tel: (415) 772-1200

Richard A. Cederoth  
Bar No. 6185199  
John W. McBride  
Bar No. 6294453  
Kevin R. Oliver  
Bar No. 6324436  
Richard M. Chen  
Bar No. 6325568  
rcederoth@sidley.com  
jwmcbride@sidley.com  
kevin.oliver@sidley.com  
rchen@sidley.com  
**SIDLEY AUSTIN LLP**  
One South Dearborn  
Chicago, IL 60603  
Tel: (312) 853-7000

Melissa R. Smith  
Bar No. 24001351  
melissa@gillamsmithlaw.com  
**GILLAM & SMITH, LLP**  
303 South Washington Avenue  
Marshall, TX 75670  
Tel: (903) 934-8450

Waco, TX 76712  
Tel.: (254) 651-3690  
Fax: (254) 651-3689  
mark@swclaw.com

*Counsel for Plaintiff WSOU Investments, LLC  
d/b/a Brazos Licensing and Development*

James Travis Underwood  
Bar No. 24102587  
travis@gillamsmithlaw.com  
**GILLAM & SMITH, LLP**  
102 N. College, Suite 800  
Tyler, TX 75702  
Tel.: (903) 934-8450  
Fax: (903) 934-9257

*Counsel for Microsoft Corporation*

**CERTIFICATE OF SERVICE**

The undersigned certifies that on June 15, 2022, I electronically filed this document with the Clerk of Court via the Court's CM/ECF system which will send notification of such filing to all counsel of record, all of whom have consented to electronic service in this action.

/s/ Mark D. Siegmund

Mark D. Siegmund  
Counsel for Plaintiff